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AMBU A/S, AMBU INC., AND AMBU LTD.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

THE LARYNGEAL MASK COMPANY LTD.
and LMA NORTH AMERICA, INC.,

Plaintiffs,

v.

AMBU A/S, AMBU INC., and AMBU LTD.,

Defendants,

AND RELATED COUNTERCLAIMS.

Case No. 3:07-cv-01988 DMS (NLS)

Jury Trial Demanded

**APPLICATION FOR LEAVE TO FILE
UNDER SEAL PORTIONS OF
DEFENDANTS' REPLY IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT OF
INVALIDITY FOR ANTICIPATION AND
OBVIOUSNESS**

Date: September 18, 2009
Time: 1:30 p.m.
Courtroom: 10, 2nd Floor
Judge: Honorable Dana M. Sabraw

Pursuant to Civil L.R. 7.2 and 79.2.c, Defendants Ambu A/S, Ambu Inc. and Ambu Ltd., (collectively "Ambu") hereby moves the Court for an Order permitting it to file under seal in this Court certain limited portions of text within Ambu's Reply in Support of Motion for Summary Judgment of Invalidity for Anticipation and Obviousness, Declaration of Darryl M. Woo in Support Thereof ("Woo Declaration"), and exhibits thereto, which contain information that has been

1 designated by Ambu and by Plaintiffs The Laryngeal Mask Company Ltd. and LMA North
2 America Inc. (collectively “LMA”) as confidential under the terms of the Protective Order entered
3 by the Court on September 3, 2008 (Dkt. No. 74).

4 The specific documents and portions of documents at issue are as follows:

5 1. Declaration of Darryl M. Woo in Support of Defendants’ Reply in Support of
6 Motion for Summary Judgment of Invalidity for Anticipation and Obviousness:

7 a. The following Exhibits to the Declaration of Darryl M. Woo:

8 i. Exhibits B and D
9

10 Ambu respectfully requests that the Court grant its motion to file the above document
11 under seal in accordance with the Protective Order.

12 Dated: September 4, 2009

FENWICK & WEST LLP

14 By: /s/ **Darryl M. Woo**
15 Darryl M. Woo

16 Attorneys for Defendants and Counterclaimants,
17 AMBU A/S, AMBU INC., AND AMBU LTD.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule 5.2 on September 4, 2009.

By: /s/ *Darryl M. Woo*

Darryl M. Woo

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